

UNITED STATES DISTRICT COURT
for the
DISTRICT OF MASSACHUSETTS

FILED
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CIVIL ACTION NO.
2005-1-10000
U.S. DISTRICT COURT
DISTRICT OF MASS.

JOSEPH E. BLAKE,
Plaintiff,

v.

ROBERT MURPHY, et al.,
Defendants.

PLAINTIFF'S MOTION IN OPPOSITION TO THE
DEFENDANT'S MOTION TO EXTEND TIME TO RESPOND TO COMPLAINT

The plaintiff requests that this Court deny defendants' second request to extend the time in which to respond to the complaint. As grounds for this motion, the plaintiff states as follows:

1. The counsel for the defendants' allegation of insufficient time is patently false.
2. Counsel for the defendants has repeatedly proffered his "heavy caseload" as reason for extensions.
3. Counsel has specifically advanced the Sexually Dangerous person trials Pentlarge v. Commonwealth, Suffolk No. 04-10720 and Richlin v. Commonwealth, No. 03-10348 as grounds for extension. Alleging that these trials were expected to last as long as four weeks apiece.
4. In reality the Pentlarge and Richlin trials each were completed in five or less days, leaving approximately six weeks that Attorney Mansfield had allocated for trial which could have been utilized to "research legal issues" and "develop

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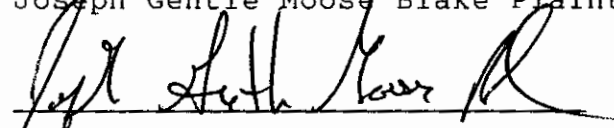
a meaningful response" to plaintiff's complaint.

5. Mr. Mansfield works with a team of paid attorneys making his argument of "a full calandar" and "heavy workload" so specious that the Court should attach no weight to these assertions.

6. The defendants' response is wholly insubstantial, frivolous and not advanced in good faith. Allowing the defendants further time extentions in no way serves justice.

WHEREFORE, the plaintiff respectfully requests that this Court: DENY the defendants' second motion to extend time to respond to complaint.

Respectfully submitted
Joseph Gentle Moose Blake Plaintiff

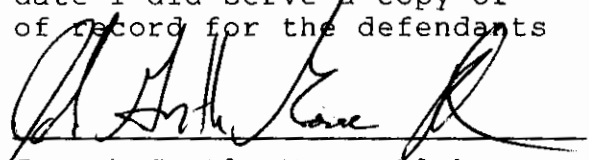

Joseph Gentle Moose Blake, Pro Se
Nemasket Correctional Center
30 Administration Road
Bridgewater, MA 02324

DATED 3/9/06

CERTIFICATE OF SERVICE

I hereby certify that on this date I did serve a copy of the above document on the attorney of record for the defendants by intra-institutional mail.

DATED 3/9/06


Joseph Gentle Moose Blake